

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE WORLD TRADE CENTER LOWER : 21 MC 102 (AKH)
MANHATTAN DISASTER SITE LITIGATION :
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IN RE COMBINED WORLD TRADE CENTER : 21 MC 103 (AKH)
AND LOWER MANHATTAN DISASTER SITE :
LITIGATION (straddler plaintiffs) :
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**NOTICE OF MOTION FOR AN ORDER EXTENDING THE
TIME FOR PLAINTIFFS TO PROVIDE UPDATED
CERTIFICATIONS**

PLEASE TAKE NOTICE that on a day to be determined by this Court, Worby Groner Edelman & Napoli Bern, LLP, counsel for the moving plaintiffs herein, shall apply to the Honorable Alvin K. Hellerstein, U.S.D.J. at the Southern District of New York located at 500 Pear Street, New York, New York, Room 14-D for an Order extending the time for certain Plaintiffs to provide updated certifications to their discovery responses pursuant to this Court's November 8, 2011 Order directing the same to be completed by November 18, 2011, along with such further and additional relief as this Court deems just and proper.

Dated: New York, New York
November 14, 2011

/s/ Christopher R. LoPalo
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